



CDSS

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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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ARNOLD SCHWARZENEGGER
GOVERNOR

May 4, 2009

Ms. Ann E. Connolly, Director
Tuolumne County Human Services Agency
20075 Cedar Road North
Sonora, CA 95370

Dear Ms. Connolly:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of September 30, 2008. Enclosed is the final report on the review.

There were some compliance issues identified in the report, which will require the development of a corrective action plan. Please submit your plan within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a request since our report is a public document. If you would like us to include a copy of your corrective action plan when responding to these requests, please indicate this when submitting your plan.

If you need technical assistance in the development of your plan, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Amy Arndt, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
County of Tuolumne Human Services Agency
Conducted September 30, 2008**

**California Department of Social Services
Human Rights and Community Services Division
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Reviewers

**Claudia Cabrera
And
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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Tuolumne Human Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on September 30, 2008. An exit interview was held on September 30, 2008 with the following staff to review the findings:

- Ann Connolly Director
- Cori Ashton Senior Analyst/CRC
- Steve Boyach Assistant Director
- Jimmie Nixon CFO
- Bonnie Tuel Program Manager, HSA
- Linda Downey Program Manager, CWS
- Lynn Nolte Program Manager, WTW/IHSS
- Rebecca Espino Program Manager, Eligibility

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Tuolumne Human Services Agency	20075 Cedar Road North, Sonora	FS, CalWORKs, WTW, IHSS	None
Tuolumne Human Services Agency	20111 Cedar Road North, Sonora	Children's Services	None

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2008/2009 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	3	1
Children Social Workers	2	
Adult Program Workers	1	
Receptionist/Screeners	1	
Total	7	

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	13
Non-English or limited-English speakers' case files reviewed	7
Languages of clients' cases	English, Spanish

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Client applications can be mailed in and staff can also accommodate clients by flexing their office hours from 7:00am-5:30pm on an as-needed basis.
Does the county have extended hours to accommodate clients?	X			Staff can accommodate clients by flexing their office hours from 7:00am-5:30pm and can also make appointments during their lunch hour on an as-needed basis.
Can applicants access services when they cannot go to the office?	X			Clients can access services via telephone and if needed home visits can be scheduled.
Does the county ensure the awareness of available services for individuals in remote areas?	X			The County publishes a resource directory that is distributed to resource centers, shelters, food banks, community based organizations, and clinics. Clients can also visit their website.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)? Is the pamphlet distributed and explained to each client at intake and re-certification?	X X			All county programs use the PUB 13. PUB 13 is placed in the intake screening material packets and then explained in the face-to-face interview.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			PUB 13 available in English and Spanish and in other languages upon request.
Was the Pub 13 available in large print, audiocassette and Braille?	X			Available in large print, audiocassette and Braille.
Were the current versions of the required posters present in the lobbies?	X			PUB 86 "Everyone is Different but Equal under the Law" and the "And Justice for All" posters were present in the lobby. Also present in all offices was a poster titled "We Speak your Language." Good job!
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All workers were aware of the location of the PUB 86.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		N/A		Tuolumne county has no threshold language as majority of clients are English-speaking.

B. Corrective Actions

None required.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A1. Facility Location: Main Office, 20075 Cedar Road North, Sonora

Facility Element	Findings	Corrective Action
Parking	There was NO "Unauthorized Parking" sign at entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible space not displaying distinguishing placards or license plates issued for persons with disabilities may be towed at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133

	<p>Freestanding sign height was too low at 76".</p> <p>The words "No Parking" were painted below the access aisle. Must be painted inside access aisle.</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p>
Exterior entrance	<p>Double doors: Door pressure on the right was excessive at 10 lbs. Door pressure on the left was also excessive at 13 lbs.</p> <p>The door on the right exceeds the 3-second closure requirement.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p> <p>Door Closer (if present) must be set so it takes at least 3 seconds to close from an open position of 70 degrees to a point 3" from the latch. (CA T24 1133B.2.5.1, ADA 4.13.10) p. 199</p>
Outside signage	<p>ISA sign at main entrance is posted but the "No Smoking" sign covers it.</p>	<p>Place ISA sign in a visible area.</p> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p>
Client lobby	<p>There is a "Notice of Language" card posted by the receptionist's desk.</p>	<p>Well done! This allows the clients to point to their primary language if they are non-English speaking.</p>

Facility Element	Findings	Corrective Action
Client Interview Booths	Clients in a wheelchair are unable to turn around and exit the booths.	<p>It was noted that clients in the interview booths are assisted by the worker and are wheeled out in reverse.</p> <p>Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217</p>
Restroom	<p>Men's: The pipes under the sink need to be re-wrapped.</p> <p>The faucet cannot be operated with one hand; cannot operate with closed fist.</p> <p>Women's: The pipes under the sink need to be re-wrapped.</p> <p>The faucet cannot be operated with one hand; cannot operate with closed fist.</p>	<p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267</p> <p>Faucet controls and operating mechanisms are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. If self closing valves are used, faucet remains open a minimum of 10 seconds. (CA T24 1115B.2.1.2.1., ADA 4.27.4, ADA 4.19.4) p. 267</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267</p> <p>Faucet controls and operating mechanisms are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. If self closing valves are used, faucet remains open a minimum of 10 seconds. (CA T24 1115B.2.1.2.1., ADA 4.27.4, ADA 4.19.4) p. 267</p>

B. Recommendation

The client interview booths were not wheelchair accessible. There is insufficient wheelchair turning space and clients are unable to wheel themselves out. Staff stated that when a client in a wheelchair enters a booth they are assisted by the worker who comes around the booth and wheels them out in reverse. It would be more convenient to have a designated room that is wheelchair accessible that would allow clients in a wheelchair to turn around when exiting without needing assistance from the workers.

A2. Facility Location: Children's Services, 20111 Cedar Road North, Sonora

Facility Element	Findings	Corrective Action
Parking	<p>There was NO "Unauthorized Parking" sign at entrance to off-street accessible parking.</p> <p>The words "No Parking" were not painted in access aisle.</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible space not displaying distinguishing placards or license plates issued for persons with disabilities may be towed at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133</p> <p>The words "NO PARKING" shall be painted on the ground in each 5' or 8' loading and unloading access aisle in white letters no smaller than 12". (CA T24 1129B.4.1 & 2) p. 135</p>
Exterior entrance	<p>There was no ISA sign posted at the entrance.</p> <p>Door pressure was excessive at 12 lbs.</p>	<p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p> <p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11(2)(a) & (b)) p. 195</p>

Facility Element	Findings	Corrective Action
Outside signage	There was no directional sign to main entrance posted near the accessible space.	Since the accessible parking space is located further away from the main entrance due to the elevation of the sidewalk and steepness of the stairs, there needs to be a directional sign designating where the main entrance is.
Client lobby	There was a poster titled "We Speak your Language" posted on the wall.	Good job!
Restroom	Men's: The signage on the door was too low at 56".	<p>Door sign and wall sign shall be 60" above the floor.</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
	Door pressure was excessive at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
	Knee space below the sink was too low at 25".	A minimum knee clearance of 27" high, 30" wide, and 19" deep is provided underneath sinks. (ADA 4.24.3) p. 311
	Rim height of sink in accessible stall was too low at 26".	Sink is mounted with a counter or rim no higher than 34". (ADA 4.24.2 & 4.19.2) pp. 311, 267
	Women's: The signage on the wall was too low at 56".	Door sign and wall sign shall be 60" above the floor.

		<p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
	Door pressure was excessive at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
	Pipes under sink need to be re-wrapped.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267

B. Recommendation

There was no accessible parking space located near the main entrance. The sidewalk is elevated and there are steep stairs leading to the door. Due to the cost of leveling the sidewalk, the county is unable to designate an accessible parking space close to the entrance. For this reason the accessible parking spaces have been moved to the end of the aisle allowing disabled clients accessibility into the building. Since these spaces are further away from the entrance, there needs to be a directional sign designating where the main entrance is.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			If the client is non-English speaking the receptionist refers them to a Unit Supervisor or lead worker for assessment to determine their language needs.
Does the county use a primary language form?	X			The county uses the Primary Language Designation Form WD 55-183.
Does the client self-declare on this form?	X			Clients complete the form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Spanish-speaking caseloads are assigned to the bilingual worker.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			The county can arrange for the use of bilingual staff, certified interpreters, volunteer county staff or tele-interpreters.
Is there a delay in providing services?		X		If bilingual staff is not available workers can access tele-interpreters.

Question	Yes	No	Some-times	Comments
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			The county uses tele-interpreters and has access to county provided interpreters.
Are county interpreters determined to be competent?	X			Interpreters are certified through Cooperative Personnel Services (CPS). The county also trains staff in-house and uses a brochure entitled "DSS staff guidelines for volunteer and client provided interpreters."
Does the county have adequate interpreter services?	X			The county has one Spanish-speaking interpreter.
Does the county allow minors to be interpreters? If so, under what circumstances?	X			Only on an emergency basis would minors be allowed to interpret basic information, such as scheduling an interview appointment but this is rarely the case as the majority of the clients are English-only speaking.
Does the county allow the client to provide his or her own interpreter?	X			If client provides his/her own interpreter, the client signs an "authorization for release of information" and the interpreter signs the "oath of confidentiality" form.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			If worker is unsure of competency of client provided interpreter they will arrange for a county provided interpreter.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Forms are provided in either English or Spanish.

Question	Yes	No	Some-times	Comments
Is the information that is to be inserted into NOA translated into the client's primary language?	X			When necessary, the county will use tele-interpreters for paragraph translations.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			ASL interpreters are available for the hearing impaired. Receptionists are also available to provide assistance if a client needs help with their wheelchair.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff read or assist in completing forms if requested by clients.
Does the county offer screening for learning disabilities?	X			Upon evaluation and/or request from the client, they are referred to a consultant.
Is there an established process for offering screening?	X			Clients with learning disabilities are referred to a private consultant contracted with the county for a follow-up assessment.
Is the client identified as having a learning disability referred for evaluation?	X			Clients with learning disabilities are referred to a private consultant contracted with the county for a follow-up assessment.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	Primary Language Designation Form WD 55-183	Form SOC 295	SAWS 1 or county computer system, Citrix	SAWS 1 or Primary Language Designation Form WD 55-183
Primary language documentation	Primary Language Designation Form WD 55-183	Form SOC 295	SAWS 1 or Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183
Method of providing bilingual services and documentation	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183
Client provided own interpreter	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183
Method to inform client of potential problem using own interpreter	Applicant's Authorization for Release of Information	Applicant's Authorization for Release of Information	Applicant's Authorization for Release of Information	Applicant's Authorization for Release of Information
Release of information to Interpreter	Oath of Confidentiality	Oath of Confidentiality	Oath of Confidentiality	Oath of Confidentiality
Individual's acceptance or refusal of written material offered in primary language	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183	Primary Language Designation Form WD 55-183

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Documentation of minor used as interpreter	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients
Documentation of circumstances for using minor interpreter temporarily	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients	Would be in case narrative; none found as the majority of the cases reviewed were English-only speaking clients
Translated notice of actions (NOA) contain translated inserts	Bilingual staff provides translation and when in need, staff will use tele-interpreters	Bilingual staff provides translation and when in need, staff will use tele-interpreters	Bilingual staff provides translation and when in need, staff will use tele-interpreters	Bilingual staff provides translation and when in need, staff will use tele-interpreters
Method of identifying client's disability	Identified in Primary Language Designation Form WD 55-183	Identified in case narrative	Identified in Form CW 2186A; none found in case files	Identified in Form CW 2186A; none found in case files
Method of documenting a client's request for auxiliary aids and services	Primary Language Designation Form WD 55-183	Identified in case narrative	None noted	None noted

B. Corrective Actions

None required.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			The CRC provides mandatory Division 21 training to all new DSS staff and annual refresher training up to four times a year.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Staff are aware of what the process is for filing a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

None required.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			Staff can identify what a program, discrimination and personnel complaint are.
Did the employees know who the Civil Rights Coordinator is?	X			All staff know that Cori Ashton is the civil rights coordinator.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			Staff know that the CRCs information is posted on the PUB 86.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action

None required.

IX. CONCLUSION

The CDSS found the Tuolumne County Human Services Agency to be in overall compliance with CDSS Division 21 Regulations, and other applicable state and federal laws with some exceptions. The CDSS would like to acknowledge and thank Ms. Cori Ashton, Civil Rights Coordinator for her coordination, assistance, and cooperation during the review. The Tuolumne county staff interviewed were found to be professional, pleasant and committed to providing outstanding service to their clients.

Tuolumne County Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the deficiencies.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.